BREAK: OTHER:

U.S. ENVIRONMENTAL PROTECTION AGENCY \$250,000 EMERGENCY ACTION MEMORANDUM

Date:

March 28, 2007

Subject:

NOTIFICATION OF \$250,000 ACTIVATION

Barite Hill Nevada Goldfields Site

McCormick, McCormick County, South Carolina

From:

Jeffery J. Crowley, Federal On-Scene Coordinator U.S. Environmental Protection Agency, Region 4

To:

Regional Response Center, 4WD-ERRB

South Carolina Department of Health and Environmental Control

Lisa Boynton, EPA-HQ, Regional Coordinator

Shane Hitchcock, ERRB Jim McGuire, ERRB

Leonardo Francendese, Responding OSC

Site File

Site No: A4NZ

ERNS No: NRC#830526 NPL Status: Non-NPL

Response Authority: CERCLA

Start Date: March 28, 2007

Task Order: 0204-F4-0071

PO Amount: \$50,000 Contractor: CMC, Inc.

State Notification: October 19, 2006

Completion Date: TBD

I. INTRODUCTION

On March 27, 2007, a Federal On-Scene Coordinator (OSC) with the Emergency Response and Removal Branch (ERRB), U.S. EPA Region 4, was conducting an assessment of the subject site, which is an abandoned gold mine. The OSC identified several leaking drums of acids and methyl ethyl ketone (MEK) as well as several bags of caustic soda and a large mixing tank full of caustic solution. The drums are located in an on-site warehouse which shows signs of trespassing. The Site has no security features and public access is unimpeded. The chemicals are also releasing from the warehouse and making their way to Hawes Creek.

The OSC contacted the Telephone Duty Officer, also an FOSC, to request ERRS assistance. Pursuant to EPA Region 4 Delegation 14-2 response authority, a FOSC holding a Warrant is delegated the authority to obligate CERCLA funding in the amount of \$250,000 to initiate a removal action in cases where site conditions constitute and emergency. Considering site conditions, the Duty Officer approved the use of CERCLA funds to mitigate the threat posed by the site.



II. BACKGROUND

The Barite Hill Nevada Goldfields site is located approximately 3 miles south of McCormick, SC between US 378 and US 221 on the northern side of Road 30 in McCormick County, SC. The mine site is relatively remote; there are no buildings, homes, or commercial buildings within 0.5 miles of the boundary. The site actively mined gold from 1991 to 1995. From 1995 until Nevada Goldfields filed for Chapter 7 Bankruptcy in 1999, the reclamation of the site was being addressed by Nevada Goldfields. On July 7, 1999 Nevada Goldfields abandoned the facility and transferred Site control South Carolina Department of Health and Environmental Control (DHEC).

There are 7 processing ponds onsite containing an unknown amount of free-liquids. Three large, multi-acre, waste rock piles contaminated with cyanide are left onsite. Each waste rock pile has the potential for producing acid. Storm water run on and runoff are not controlled at the site. The Main Pit from the mining operations remains. The pit contains approximately 100 million gallons of water with a pH of 2 ~ 2.2 and a high dissolved metal content. Seeps from the main pit containing acidic water with high dissolved metal content are being released to the northern unnamed tributaries of Hawes Creek which borders the pit.

The Site was referred to ERRB October 19, 2006 for consideration as a possible removal site. ERRB is currently conducting the removal assessment at the Site. The release from the stored drums onsite was discovered March 27, 2007, necessitating an Emergency Response action.

III. THREAT

Section 300.415 of the National Contingency Plan (NCP) lists a number of factors to be evaluated in determining the appropriateness of a removal action. The following paragraphs apply to the Barite Hill Nevada Goldfields Site:

§300.415(b)(2)(i). "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."

There are abandoned drums that contain hazardous substances, pollutants or contaminants located on the Site. These drums are located in an unsecured warehouse which allows for public access. There is no fence or any other engineering controls on the Site which would prevent humans from entering the Site and potentially being exposed to hazardous substances. The hazardous substances also have a mechanism to reach Hawes Creek, a surface water body of the United States.

§300.425(b)(2)(iii). "Hazardous Substances or pollutants or contaminants in drums, barrel, tanks, or other bulk storage containers, that may pose a threat of release."

There are unsecured, abandoned drums containing hazardous substances, pollutants or contaminants on the site. The integrity of these drums is questionable and poses a threat of release. In addition, trespassers or vandals could access the site and cause a release by tampering with the drums.

§300.415(b)(2)(vii). "The availability of other appropriate Federal or State response mechanisms to respond to the release."

At this time there exist no additional State mechanisms that are able to respond to this incident in the required manner. EPA initially assumed cleanup activities at the Site through a State referral.

IV. PLANNED REMOVAL ACTIVITIES

Anticipated immediate removal activities for the Site include, but are not limited to, the following:

- Emergency stabilization of drums which may be leaking or have questionable integrity;
- Moving drums to a secured location on site to reduce the potential of a release or exposure to hazardous chemicals;
- Sampling of drums for hazard categorization to determine the specific nature of contents of the drums, if necessary;
- Bulking of materials and disposal off site, if necessary, in compliance with Federal regulations including the CERCLA off site rule;
- Provide public warning via signage or other methods to deter public access to the Site.

V. BUDGET

The total Site ceiling for this emergency action is \$250,000. The budget has been structured as appears below. Changes in the structure may be made by the OSC at his/her discretion.

TOTAL	$250,000^{1}$
Contingency	100,000
ERT	50,000
ERRS	100,000

Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include prejudgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes

VI. APPROVAL

As conditions noted on March 28, 2007 at the Barite Hill Nevada Goldfields Site meet conditions set forth under Section 300.415 of the NCP, the FOSC has initiated funding of an emergency removal action.

ORIGINAL SIGNED BY JEFFERY J. CROWLEY ON 3/28/07

Jeffery J. Crowley, FOSC Emergency Response and Removal Branch U.S. EPA Region 4